

## **REMARKS**

The Examiner is thanked for the performance of a thorough search.

No claims have been amended, canceled, or added. Hence, Claims 1-48 are pending in the present application.

Each issue raised in the final Office Action mailed March 17, 2009 is addressed hereinafter.

### **I. ISSUES RELATED TO THE CITED ART**

#### **A. INDEPENDENT CLAIM 1**

Claim 1 was rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Abrams et al., U.S. Patent No. 6,675,350 (“ABRAMS”) in view of Polizzi et al., U.S. Patent Application Publication No. US 2002/0052954 (“POLIZZI”). The rejection is respectfully traversed.

1. ABRAMS and POLIZZI do not describe the feature of Claim 1 of inserting the component that was generated by the portlet into the page.

Among other features, Claim 1 requires:

**in response to receiving a request to display the page**, performing the steps of:  
**determining that the page is associated with a page parameter** from the one or more page parameters;

...;

**inserting** the component that was generated by the portlet **into the page**.

As shall be explained in detail hereafter, at least these express limitations are completely missing from both ABRAMS and POLIZZI, therefore even if it were proper to combine ABRAMS and POLIZZI, the combination would still not satisfy the express limitations of Claim 1.

The express limitations of Claim 1, recited above make it clear that the following three things relate to **the same page**:

- (1) **the page is requested for display;**
- (2) **a page parameter is associated with the page; and**
- (3) **a component (that is generated by a portlet based on a value of the page parameter) is inserted into the page.**

Nothing, in either ABRAMS or POLIZZI, can possibly be this page.

Specifically, nothing in ABRAMS describes that, in response to a request to display a page that has a page parameter, a component is inserted into that same page where the content of the component is based on the value of the page parameter.

For example, what is illustrated in Figs. 2A and 2B of ABRAMS cannot correspond to the page of Claim 1 because Figs. 2A-2B show pages **from which information is extracted** but never inserted (i.e., the ABRAMS' HTML parser tool cannot insert anything in a page, such as CNN News, from which the tool extracts summary information/headlines).

In col. 5, line 45 to col. 6, line 32 ABRAMS describes several mechanisms in which already-extracted summary information/headlines may be displayed to the user. However, displaying extracted information to a user is completely different than inserting, into a page requested by a user, a component that is generated by a portlet (where the content of the component is based on a value for a page parameter of the page).

To exemplify the difference, consider a situation in which a user uses the ABRAMS technique on a page that includes both “content A” and “content B”. With ABRAMS, the user can extract “content A” from the page, and have “content A” displayed to him/her. Thus, the user sees a **subset** of the target page.

In stark contrast to ABRAMS, using the technique recited in Claim 1, a user requests a page that includes both “content A” and “content B”, and receives that page after “content

C” has been inserted into it. Thus, the user receives a **superset** “A, B and C” of the content of the target page. In Claim 1, the “content C” that is added to the page is **a component that is generated by a portlet based on the value of a parameter associated with the original page.**

As an example of how ABRAMS extracts and presents a subset of the target page, the summary information/headlines may be displayed as a ticker (see ABRAMS, col. 5, lines 45-54), as a tabbed display (see Fig. 6, and col. 5, line 55 to col. 6, line 5), as a portal view (col. 6, lines 6-11), and as a user-customized portal view (col. 6, lines 12-32.) Significantly, however, none of these mechanisms describes that a component is inserted into the same page that has a page parameter, where the component is generated by a portlet based on a value of the page parameter.

In col. 6, lines 12-25 ABRAMS also describes that HTML code may be generated as a user-customized portal view in order to display summary information/headlines which have already been extracted by using ABRAMS’ HTML parser tool. The fact that ABRAMS mentions the word “portal” in this section should not confuse the fact that what is being displayed to the user is merely information that has been extracted from a target page. A dynamically generated portal view (such as the user-customized portal view in ABRAMS) is not a page with an associated page parameter, and does not have a component that is inserted into it, where the component is generated by a portlet based on a value of a page parameter of the page (such as the page featured in Claim 1).

Thus, ABRAMS does not disclose anything that can possibly be the page that is required by Claim 1. Consequently, if the combination of ABRAMS and POLIZZI is to serve as the basis for rejecting Claim 1, POLIZZI must disclose a page that satisfies the requirements specified in Claim 1:

- (1) the page is requested for display;**
- (2) a page parameter is associated with the page; and**
- (3) a component (that is generated by a portlet based on a value of the page parameter) is inserted into the page.**

However, POLIZZI does not disclose any such page, and therefore cannot cure these deficiencies of ABRAMS with respect to the above features of Claim 1.

As a preliminary matter, it is noted that POLIZZI does not even mention the terms “page parameter”, “portlet parameter”, and “mapping”. Further, the Office Action does not specify exactly what structure or thing in POLLIZI corresponds to the features of Claim 1 of page parameter, portlet parameter, and a mapping that maps page parameters to portlet parameters. Instead, the Office Action cites paragraphs [0030], [0032], [0033], and [0092] of POLIZZI in a non-specific way that is not correlated to the features of Claim 1. Because the Office Action did not provide the Applicants with adequate notice or reasonable particularity with respect to the basis of the rejection of Claim 1, the Applicants have scoured POLIZZI to find anything that could possibly satisfy these features of Claim 1. However, our efforts were in vain -- the Applicants could not find any structure or functionalities in POLIZZI that correspond to the above features of Claim 1.

For example, POLIZZI describes a portal system that presents data to users in portal pages, where each user’s portal page may be customized to suit that user’s specific needs. (See POLIZZI, paragraphs [0006]-[0007].) In POLIZZI’s portal system, a portal page presents data to a user in the form of portal objects (see paragraph [0030]), where the portal objects are essentially files that may have various MIME types (see paragraphs [0038]-[0039]). POLIZZI also describes that a user may customize what is displayed in her portal page (see paragraph [0032]), and that the portal system may present to the user HTML forms through which the user may submit input data for jobs that the user can execute on a job

server (see paragraph [0033]). Significantly, however, POLIZZI expressly describes that the content displayed in the portal page is manually selected by the user (e.g., see paragraphs [0030], [0081]). Thus, the portal page of POLIZZI is not a page into which a component is inserted, where the component is generated by a portlet based on a value of a page parameter of the page, such as the page featured in Claim 1. To put it differently, the content to be displayed in a particular portal page of POLIZZI is selected by a particular user and is not **generated by portlets based on the values of page parameters in that particular portal page.**

For the foregoing reasons, ABRAMS and POLLIZI do not describe or suggest the features of Claim 1 of:

in response to receiving a request to display the page, performing the steps of: determining that the page is associated with a page parameter from the one or more page parameters; ... and inserting the component that was generated by the portlet into the page.

However, as shall be explained hereafter, these are not the only express limitations that are completely missing from ABRAMS and POLLIZI.

2. ABRAMS does not describe or suggest the feature of Claim 1 of inspecting the mapping to determine that the page parameter is mapped to a portlet parameter of a portlet that generates a component of the page that is based, at least in part, on the portlet parameter.

Among other features, Claim 1 requires:

retrieving and inspecting the mapping to determine that the page parameter is mapped to a portlet parameter of a portlet that generates a component of the page that is based, at least in part, on the portlet parameter.

In addition to the features of Claim 1 discussed above, this feature is also missing from both ABRAMS and POLLIZI.

The Office Action asserts that this feature of Claim 1 is described in ABRAMS. Specifically, the Office Action asserts that input entered by a user in the graphical user interface (GUI) of ABRAMS' HTML parser tool (as explained in Figs. 2A and 2B and in col. 4, lines 13-30) corresponds to the page parameters and the mapping of Claim 1. The Office Action also asserts that something that apparently generates the user-customized portal view in col. 6, lines 12-25 of ABRAMS corresponds to the portlet of Claim 1. These assertions are incorrect.

The Office Action fails to recognize that the input provided by a user to ABRAMS' HTML parser tool in order to select summary information/headlines from various web sites (as described in col. 4, lines 13-30) is completely different and separate from the user-defined organizational structure that may be used to generate HTML code for the purpose of displaying already-extracted summaries/headlines to the user (as described in col. 6, lines 12-25).

The input provided to ABRAMS' HTML parser tool is used to select which summary information/headlines are to be extracted. The user-defined organizational structure described in col. 6, lines 12-25 of ABRAMS is used for generating HTML code for formatting and displaying already-extracted summary information/headlines. Thus, any user-provided data values for selecting summary information/headlines are not used to generate HTML code that would display the extracted summary information/headlines. Consequently, ABRAMS cannot possibly describe any mapping between the user-provided input for selecting summary information/headlines and any user-defined organizational structure that is used to generate HTML code for displaying the extracted summary information/headlines.

For at least the foregoing reason, ABRAMS does not describe the feature of Claim 1 of inspecting the mapping to determine that the page parameter is mapped to a portlet

parameter of a portlet that generates a component of the page that is based, at least in part, on the portlet parameter.

3. POLIZZI does not describe or suggest the feature of Claim 1 of generating and storing a mapping that maps one or more page parameters to one or more portlet parameters, where the mapping is stored separate from pages associated with the one or more page parameters.

Among other features, Claim 1 comprises:

generating and storing a mapping that maps one or more page parameters to one or more portlet parameters, wherein the mapping is stored separate from pages associated with the one or more page parameters.

This feature is yet another example of an express limitation that is missing from both ABRAMS and POLIZZI. The Office Action asserts that this feature of Claim 1 is described in POLIZZI. This assertion is incorrect.

As discussed above, POLIZZI does not even mention the terms “page parameter”, “portlet parameter”, and “mapping”. While the absence of these terms doesn’t prove that POLIZZI does not disclose these limitations using other terminology, it does make it difficult to ascertain what, within POLIZZI, the Office Action is equating with these features.

Unfortunately, the Office Action does not specify exactly what structure or functionality in POLIZZI corresponds to the features of Claim 1 of page parameter, portlet parameter, and a mapping that maps page parameters to portlet parameters. Instead, the Office Action cites paragraphs [0030], [0032], [0033], and [0092] of POLIZZI in a non-specific way that is not correlated to the features of Claim 1. Again, the Applicants were obliged to scour POLIZZI to see if anything therein could possibly satisfy these limitations.

The search failed. The Applicants could not find any structure or functionality in POLIZZI that corresponds to the mapping of Claim 1. For example, in paragraph [0030] POLIZZI describes that a portal page presents data to a user in the form of portal objects,

where the user may manually select which objects are to be displayed in her portal page. Paragraphs [0038]-[0039] of POLIZZI expressly describe that the portal objects are essentially files that may have various MIME types. In paragraph [0032] POLIZZI describes that a user may customize what is displayed in her portal page by using favorites and channels, where when an object is added to the favorites a link is added into the list of that user's favorites. In paragraph [0033] POLIZZI describes that a portal system may present to a user HTML forms through which the user may submit input data for jobs that the user can execute on a job server. Finally, in paragraph [0092] POLIZZI describes that when a user logs into the system, the portal objects that are included in the portal page for the user are retrieved from a repository and are assembled into that user's personalized portal page.

Significantly, however, these paragraphs from POLIZZI do not describe or suggest any use of a mapping that maps page parameters to portlet parameters of portlets that generate content based on values of the page parameters. In fact, since POLIZZI expressly describes that a personalized portal page is assembled from objects that are stored in a repository, the portal system in POLIZZI does not even need to use portlets that can generate content based on different values of the portlet parameters.

In contrast, Claim 1 expressly requires generating and storing a mapping that maps one or more page parameters to one or more portlet parameters, where the mapping is stored separate from pages associated with the one or more page parameters.

For the foregoing reasons, POLIZZI does not describe or suggest the feature of Claim 1 of a mapping that maps one or more page parameters to one or more portlet parameters, where the mapping is stored separate from pages associated with the one or more page parameters.



For the foregoing reasons, ABRAMS and POLIZZI do not describe or suggest all features of Claim 1. Thus, Claim 1 is patentable under 35 U.S.C. § 103(a) over ABRAMS in view of POLIZZI. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

B. INDEPENDENT CLAIM 18

Claim 18 was rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over ABRAMS in view of POLIZZI. The rejection is respectfully traversed.

1. POLIZZI does not describe or suggest the feature of Claim 18 of generating and storing a first mapping that maps one or more events to one or more actions and one or more event output parameters to one or more page parameters, wherein the first mapping is stored separate from pages associated with the one or more page parameters.

Among other features, Claim 18 requires:

generating and storing a first mapping that maps one or more events to one or more actions and one or more event output parameters to one or more page parameters, wherein the first mapping is stored separate from pages associated with the one or more page parameters.

ABRAMS and POLIZZI are completely missing this express feature of Claim 18. The Office Action asserts that this feature of Claim 18 is described in paragraphs [0030], [0033], and [0060] of POLIZZI. This assertion is incorrect.

As discussed above with respect to Claim 1, POLIZZI does not describe or suggest any mappings that involve page parameters. Further, the Office Action asserts that the time events described in POLIZZI are mapped to one or more “actions/updates/scheduling of a job”. This assertion is incorrect.

In paragraph [0060], POLIZZI describes a schedule that is stored in an event server, where a portal system can use the schedule to run various jobs. (It is noted that POLIZZI defines a job as an executable program file such as a report-generating application – see

paragraph [0039].) To schedule a job, the job must be associated with a time event, a parameter list, and a schedule. The time event defines a timetable for running a job and the parameter list defines the compile-time and run-time values necessary to execute a job. Significantly, however, the schedule described in POLIZZI relates to executing programs at certain times and has nothing to do with pages or page parameters. Further, while paragraph [0060] of POLIZZI may be describing that the execution of a program may be set in response to certain time events, the time events themselves are not described as having any particular output parameters.

In contrast, Claim 18 comprises the feature of generating and storing a first mapping that maps one or more events to one or more actions and one or more event output parameters to one or more page parameters, where the first mapping is stored separate from pages associated with the one or more page parameters. Thus, the mapping of Claim 18 is a two-fold mapping: (1) events are mapped to actions, and (2) event output parameters are mapped to page parameters. Since the time schedule described in POLIZZI does not even involve any page parameters or event output parameters, the time schedule of POLIZZI does not correspond to the first mapping featured in Claim 18.

Further, as discussed above with respect to Claim 1, in paragraph [0030] POLIZZI describes that a portal page presents data to a user in the form of portal objects, where the user may manually select which objects are to be displayed in her portal page. In paragraph [0033] POLIZZI describes that a portal system may present to a user HTML forms through which the user may submit input data for jobs that the user can execute on a job server. Significantly, however, neither these paragraphs nor any other paragraphs of POLIZZI describes or suggest generating and storing a mapping such as the first mapping featured in Claim 18.

For the foregoing reasons, it is respectfully submitted that POLIZZI does not describe or suggest the feature of Claim 18 of generating and storing a first mapping that maps one or more events to one or more actions and one or more event output parameters to one or more page parameters, wherein the first mapping is stored separate from pages associated with the one or more page parameter.

2. ABRAMS does not describe or suggest the feature of Claim 18 of determining, based on the first mapping and the passed data, an action to perform in response to the particular event.

Among other features, Claim 18 comprises:

determining, based on the first mapping and the passed data, an action to perform in response to the particular event.

The Office Action asserts that this feature of Claim 18 is described in col. 4, lines 21-24 of ABRAMS. Specifically, the Office Action asserts that the action performed in ABRAMS is to display in pane 260 all hyperlinks with their associated text for the selected web site. This assertion is incorrect.

On page 14 the Office Action explicitly admits that ABRAMS does not describe a mapping that maps events to actions and event output parameters to page parameters, such as the first mapping in Claim 18. Further, as discussed above POLIZZI does not describe generating and storing a mapping such as the first mapping of Claim 18 either. Thus, POLIZZI and ABRAMS whether taken alone or in combination cannot possibly describe any functionality that is based on a mapping such as the first mapping of Claim 18.

Further, in col. 4, lines 21-24 ABRAMS describes that when a user selects a web address in pane 220 of the GUI, the HTML parser tool displays in pane 260 all hyperlinks of the site indicated by the web address. This, however, does not describe or even suggest that any determination to display the hyperlinks is made based on a mapping that maps one or

more events to one or more actions and one or more event output parameters to one or more page parameters. In other words, the action of displaying the selected hyperlinks is what the HTML parser tool is configured to do and is thus not subject to any determinations.

For the foregoing reasons, ABRAMS does not describe the feature of Claim 18 of determining, based on the first mapping and the passed data, an action to perform in response to the particular event.

3. ABRAMS does not describe or suggest the feature of Claim 18 of inspecting the first mapping to determine that an event output parameter associated with the particular event is mapped to a page parameter.

Among other features, Claim 18 comprises:

inspecting the first mapping to determine that an event output parameter associated with the particular event is mapped to a page parameter.

This limitation is also missing from the combination of ABRAMS and POLIZZI. The Office Action asserts that this feature of Claim 18 is described in col. 4, lines 21-29 of ABRAMS. This assertion is incorrect.

As discussed above, in col. 4, lines 21-30 and with respect to its Figs. 2A and 2B, ABRAMS describes that when a user selects a web address in pane 220 of the GUI, the HTML parser tool displays in pane 260 all hyperlinks of the site indicated by the web address. Significantly, however, neither this passage nor any other passages of ABRAMS describe or suggest that any mapping is inspected in the process of displaying selected hyperlinks in a pane of the GUI of the HTML parser tool. In fact, in col. 4, line 21 ABRAMS expressly states that the program (i.e., the HTML parser tool) displays the selected hyperlinks, which suggests that any processing based on the user-specified URL (including displaying in the GUI) is performed internally within the execution code of the application

tool without the need to reference any external mapping such as the first mapping of Claim 18.

In contrast, Claim 18 includes the feature of inspecting the first mapping to determine that an event output parameter associated with the particular event is mapped to a page parameter, where the first mapping maps one or more events to one or more actions and one or more event output parameters to one or more page parameters. Since ABRAMS does not describe any mapping that involves event parameters or page parameters, ABRAMS does not describe or suggest this feature of Claim 18.

For the foregoing reasons, ABRAMS and POLIZZI do not describe or suggest all features of Claim 18. Thus, Claim 18 is patentable under 35 U.S.C. § 103(a) over ABRAMS in view of POLIZZI. Reconsideration and withdrawal of the rejection of Claim 18 is respectfully requested.

C. DEPENDENT CLAIMS 2-17 AND 19-48

Claims 2-3, 5-14, 16-17, 19-26, 28-37, and 39-48 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over ABRAMS in view of POLIZZI. Claims 4 and 27 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over ABRAMS in view of POLIZZI and further in view of Hind et al., U.S. Patent Application Publication No. US 2004/0205555 (“HIND”). Claims 15 and 38 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over ABRAMS in view of POLIZZI and further in view of Katariya et al., U.S. Patent No. 6,564,251 (“KATARIYA”).

Each of Claims 2-17 and 19-48 depends directly or indirectly from one of independent Claims 1 and 18, and thus includes each and every feature of the independent base claim. Furthermore, in rejecting Claims 4, 15, 27, and 38 the Office Action relies

explicitly on ABRAMS and POLIZZI, and not on HIND or KATARIYA, to show the features discussed above with respect to Claims 1 and 18. Because ABRAMS and POLIZZI do not teach the subject matter of Claims 1 and 18, any combination of ABRAMS and POLIZZI with the other three references necessarily fails to teach the complete combination recited in any dependent claim of Claims 1 or 18. Thus, each of Claims 2-17 and 19-48 is allowable for the reasons given above for Claims 1 and 18.

In addition, each of Claims 2-17 and 19-48 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 2-17 and 19-48 are allowable for the reasons given above with respect to Claims 1 and 18. Reconsideration and withdrawal of the rejections of Claims 2-17 and 19-48 is respectfully requested.

## II. CONCLUSION

The Applicants believe that all issues raised in the final Office Action have been addressed. Further, for the reasons set forth above, the Applicants respectfully submit that allowance of the pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm's check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the

pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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